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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

CYWEE GROUP LTD.,
 Plaintiff,
 v.
 APPLE INC.,
 Defendant.

Case No. 14-cv-01853-HSG

**STIPULATION AND ORDER FOR
 EXTENSION OF TIME FOR PATENT LOCAL
 RULE 4-5 DEADLINES**

Judge: Haywood S. Gilliam, Jr.

Pursuant to Patent L.R. 1-3 and Civ. L.R. 6-1, 6-2 and 7-12, Plaintiff CyWee Group Ltd. and Defendant Apple Inc. jointly and respectfully submit this Stipulation and [Proposed] Order seeking an order to extend the time to submit the following briefs:

Event	Current Date	Proposed Date
Comply with Patent L.R. 4-5(a) (Plaintiff files opening claim construction brief)	March 20, 2015	May 8, 2015
Comply with Patent L.R. 4-5(b) (Defendant files responsive claim construction brief)	April 17, 2015	June 5, 2015
Comply with Patent L.R. 4-5(c) (Plaintiff files reply claim construction brief)	May 1, 2015	June 26, 2015

The proposed dates are identical to those jointly proposed by the parties on March 2, 2015 in their Joint Case Management Statement and Rule 26(f) Report. (Dkt. No. 51). That statement was submitted in accordance with this Court's Order Reassigning Case, dated February 13, 2015. This Court recently set a Case Management Conference for March 24, 2015. However, because the existing deadline for the opening claim construction brief (Patent L.R. 4-5(b)) will elapse before the Case Management Conference, the Parties respectfully submit this Stipulation and [Proposed] Order seeking a modification of the schedule in advance.

The proposed order is not sought for delay, and aligns with the schedule jointly submitted by the parties. The proposed order will provide the parties with additional time to properly present to the Court their positions with respect to the claim terms at issue.

The following time modifications have occurred previously in this case:

1. On August 29, 2014, this Court, the Honorable Judge Jeffrey S. White presiding, set an order scheduling various dates associated with the claim construction proceedings in this case. (Docket 37).
2. On December 3, 2014, the Court, the Honorable Jeffrey S. White presiding, granted the parties' Stipulation and [Proposed] Order for an extension of time for Patent Local Rule 4-2 and 4-3 deadlines. (Dkt. No. 46). The parties have since complied with the Patent L.R. 4-2 and 4-3 deadlines.

- 1 3. On January 30, 2014, the Court issued a Clerk's Notice postponing the Claim
2 Construction Tutorial and Markman Hearing in this case, from March 23, 2015 and March
3 30, 2015 to May 28 and June 1, 2015, respectively. (Docket No. 48).
- 4 4. Following the modification to the Claim Construction Tutorial and Markman Hearing
5 dates, the parties entered into and filed a Stipulation and [Proposed] Order to modify the
6 claim construction briefing. (Docket No. 49). On February 4, 2015, this Court, the
7 Honorable Jeffrey S. White presiding, granted the parties' Stipulation and [Proposed]
8 Order to extend claim construction briefing dates in light of the Clerk's Notice Continuing
9 Claim Construction Tutorial and Markman Hearing. (Dkt. No. 50).
- 10 5. On February 13, 2015, the Clerk of the Court issued an Order of Reassigning Case,
11 instructing the parties to submit a new Joint Case Management Statement and Rule 26(f)
12 Report. (Docket 50(b)). The parties submitted their updated Joint Case Management
13 Conference Statement and Rule 26(f) Report on March 2, 2015, which included the
14 deadlines that the parties now propose and respectfully request that the Court adopt by this
15 Stipulation and [Proposed] Order.

16 IT IS SO STIPULATED.
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1 Dated: March 17, 2015

Respectfully submitted,

2 /s/ Jill F. Kopeikin

/s/ Timothy S. Teter

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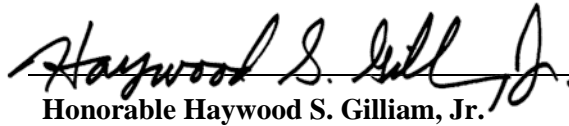
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19 Counsel for Plaintiff CyWee Group Ltd.

Attorneys for Defendant Apple Inc.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: March 17, 2015

A handwritten signature in black ink, reading "Haywood S. Gilliam, Jr.", is written over a horizontal line.

Honorable Haywood S. Gilliam, Jr.

United States District Judge

1 I, Jill F. Kopeikin, am counsel for Plaintiff Cywee Group Ltd. in this action. I
2 am the registered ECF user under whose name and password this Stipulation and
3 [Proposed] Order for Extension of Time for Patent Local Rule 4-5 Deadlines is
4 being filed. Pursuant to Civil Local Rule 5-1(i), I attest that the concurrence in the
5 filing of this document has been obtained from each of the other signatories.

6 DATED: March 13, 2015

GCA LAW PARTNERS LLP

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8 By: /s/ Jill F. Kopeikin
Jill F. Kopeikin

9 Attorneys for CYWEE GROUP LTD.
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